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June 1, 2017

VIA ECF

Hon. Valerie E. Caproni, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Kaldren LLC v. American Express Company

Case No. 1:17-cv-03625 (VEC)

Dear Judge Caproni:

I represent the plaintiff Kaldren LLC in the above-referenced action. On May 19, 2017, the Court issued an Order (Dkt. No. 9) setting an Initial Conference for June 9, 2017 at 10:00 AM, and ordering the parties to submit a joint letter regarding the case by June 1, 2017.

However, as defendant American Express Company has as of today not yet appeared or otherwise responded to the Complaint, and as no other requests for an adjournment have previously been made, plaintiff is writing to respectfully request that the Court 1) adjourn the date for the Initial Conference to July 7, 2017 to allow plaintiff sufficient time to determine if defendant will appear, 2) adjourn the date for the parties to submit the joint letter or for plaintiff to advise the Court that defendant has failed to appear or respond to the Complaint to June 30, 2017, and 3) that the Court So Order the same.

Thank you for considering these requests.

Respectfully,

/s/Jean-Marc Zimmerman

Jean-Marc Zimmerman

JMZ/bw

cc: Peter J. Corcoran, III, Esq.